



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

JAN 7 4 2000

Mr. Jim Frank
Airborne Express
Building 2053-A
145 Hunter Drive
Wilmington, OH 45177

Ref. No. 00-0325

Dear Mr. Frank:

This is in response to your November 13, 2000, letter requesting information regarding compressed oxygen and the OXIDIZER label requirements in § 175.85(h) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

First, you ask if the reference in § 175.85(h) to "compressed oxygen" means a only material with the proper shipping name "Oxygen, compressed," UN 1072. The answer is yes.

Second, you ask if the prohibition against loading "...or transport[ing] any other package for which an OXIDIZER label is required... in an inaccessible cargo compartment..." would include packages that bear an OXIDIZER subsidiary label. The answer is yes.

I hope this satisfies your request.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



000325

175.85



Johnsen
§ 175.85(h)
Proper Shipping
Name & Labeling
00-6325

November 13, 2000

RSPA
Office of Hazardous Materials Standards (DHM-10)
U.S. Department of Transportation
400 Seventh Street, SW.
Washington, DC 20590-0001

To whom it may concern,

I have two questions regarding 49CFR, part 175, section 175.85, paragraph (h).

1. Does "Compressed oxygen" refer only to the Proper Shipping Name "Oxygen, compressed UN1072". Or could it also include other Proper Shipping Names like "Compressed gas, oxidizing, n.o.s. UN 3156" when the Technical Name indicates the gas contains oxygen or oxygen mixtures?
2. Does the requirement to load "any other package for which an OXIDIZER label is required" accessible, apply to packages that bear an oxidizer subsidiary hazard labels? Or is the restriction intended only for primary hazards of oxidizer.

Please respond to:

Jim Frank
Building 2053-A
ABX Air, Inc.
145 Hunter Dr.
Wilmington OH 45177

Thank you in advance for your reply.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Frank", written over a circular scribble.

Jim Frank
Ground Training Department
(937) 382-5591 ext. 2351